

# Exhibit E

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JARROD STRINGER, et al.,	*	
Plaintiffs,	*	
	*	
v.	*	No. SA-20-CV-46-OG
	*	
RUTH HUGHS, et al.,	*	
Defendant.	*	

VIDEOTAPED VIDEOCONFERENCED

ORAL DEPOSITION

OF

THE DEMOCRATIC SENATORIAL  
CAMPAIGN COMMITTEE REPRESENTATIVE,

SARA SCHAUMBURG

Thursday, April 30, 2020

VIDEOTAPED VIDEOCONFERENCED DEPOSITION OF SARA SCHAUMBURG, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and numbered cause on Thursday, April 30, 2020, from 10:15 a.m. to 12:04 p.m. Central Time, before Debbie D. Cunningham, CSR, in and for the State of Texas, remotely reported via Machine Shorthand, pursuant to the Federal Rules of Civil Procedure.

--ooOoo--

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**Q. Sorry.**

**Would you say at a high level that DSCC's  
focus on voter registration activities has been the same  
over time, or has it changed?**

1  
2  
3       A.    I think it's definitely been a focus of the  
4 DSCC's mission. I think, you know, our focus depends --  
5 like, it will vary. Depending on the cycle, depending  
6 on the state and what race you're talking about, there's  
7 different -- you know, each state is different and  
8 presents different challenges.

9               You know, in a situation where we're  
10 dealing with a state that has put in place a lot of  
11 obstacles to voter registration, like in Texas, then it  
12 will be an even greater focus for the DSCC if there's --  
13 you know, if you have a situation like we have here,  
14 where the State's not allowing simultaneous online  
15 registration, then we know that voter registration's  
16 going to have to be a higher priority than it might be  
17 in another state where it's easier to register folks.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**Q. All right. Other than the funds that DSCC transferred down to TDP, do you know if any of its other investments in the 2019-2020 cycle in Texas have been used for voter registration?**

A. So I don't know specifically; but I do want to make two points, just to make sure this is clear so -- as far as the funding goes, because you're asking about what we've done so far. As far as transfer down funding, it's very early in the cycle to be assessing the level of transfer down funding. You know, a lot of those investments are things you wouldn't expect to see until later in the cycle, with early voting not starting for six months.

So we've done, you know, what we've done

1 so far; but on a related note, you know, we intend to  
2 spend significantly more in Texas than what we've seen  
3 already, easily into the millions, given the  
4 competitiveness of the race and the fact that the DSCC  
5 is aware of several obstacles that Texas has put in  
6 place to turning out voters, including the failure to  
7 allow for simultaneous online registration. So I just  
8 wanted to make sure that was clear.

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 question wasn't clear. I was asking which of those  
2 investments have been used for voter registration.

3 MS. BRAILEY: I'm going to object on form  
4 again.

5 A. So we contributed to the MJ for Senate. I'm  
6 not -- I can't -- I don't know what exactly that is  
7 being used for; but we have provided the maximum amount  
8 that we are able to, to her campaign directly, which I  
9 think could be used for voter registration.

10 We've given 25,000 to the coordinated,  
11 which engages in voter-registration efforts and intend  
12 to do more -- anticipate doing more through the  
13 coordinated.

14 Q. (BY MS. MACKIN) Okay. And do you know how  
15 much of that 25,000 to the coordinated has been used for  
16 voter registration?

17 A. Sitting here, I couldn't give you a specific  
18 amount. Again, I don't -- I can't speak to TDP's, you  
19 know, recordkeeping; but, like, the DS, as I said  
20 before, it's not like there's a line item for voter  
21 registration. But I do know that TDP is undertaking a  
22 huge voter-registration effort, in part, to compensate  
23 for some of the unique challenges that it faces in the  
24 state.

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Q. And so it also mentions a record number of new voters. I guess I'm -- can you help me understand what is meant by "a record number" in this context?

A. So, again, I didn't draft this; and I don't know exactly what the drafter meant. But, generally, a record number means more than have been registered through our efforts before.

Q. Okay.

A. And as I said earlier, again, TDP is in the midst of a massive voter registration campaign that transfer down funding from the DS would help to support, so.



1           Q       (BY MS. MACKIN) I guess whatever that means  
2 to you. I mean, is DSCC a -- is DSCC comprised of --  
3 does it represent the Democratic members of the Senate?  
4 Would those folks be regarded by DSCC as its members?

5                   MS. BRAILEY: Objection to a legal  
6 conclusion.

7                   But you can answer.

8           A. I don't know what our corporate filings would  
9 say about members. I mean, to the extent that you're  
10 asking how does DSCC interact with or associate with  
11 Democratic voters around the country, I mean, we have  
12 folks who sign up for our Listserv. We have people who  
13 donate to the DSCC. You know, I don't know that we have  
14 a set term for them. I think we call them "people on  
15 the Listserv" or "donors" or "supporters."

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

EXAMINATION

BY MS. BRAILEY:

Q. Ms. Schaumburg, earlier today counsel asked you about money that the DSCC transferred to the Texas Democratic Party. Do you remember that?

A. Yes.

Q. And then I believe she also asked you questions about money that the DSCC transferred to the

1 Texas Democratic Party specifically this cycle. Do you  
2 remember that?

3 A. Yes.

4 Q. Okay. For that money that was transferred to  
5 TDP for this cycle, did T -- was that money used by TDP  
6 for voter-persuasion efforts?

7 A. That's my understanding.

8 Q. And was is it used for voter-registration  
9 efforts?

10 A. That's my understanding, yes.

11 Q. And was it used for Get-Out-the-Vote efforts?

12 A. So it's my understanding that it will be used  
13 for Get-Out-the-Vote efforts. It's, you know, a program  
14 that would ramp up closer to election day.

15 Q. And how do you know that the money transferred  
16 to TDP in this cycle from DSCC is used in these ways?

17 A. I mean, we -- we work closely with the state  
18 parties in our -- in the Senate states, including with  
19 the Texas Democratic Party, on programming, on advising  
20 them on various aspects of their campaign. And so, you  
21 know, we share our -- the DS and its employees share  
22 their insight and their expertise on how to manage a  
23 campaign, what the priorities should look like. And  
24 certainly voter registration is one of those top  
25 priorities and, you know, that the TDP's budget, what

1 they prioritize, the more funding that they have from  
2 whatever sources, the more they can invest in those  
3 activities. And so, you know, I think by providing,  
4 we've conveyed that voter registration is one of our  
5 priorities; and, you know, the more budget that TDP has  
6 to spend, the more they can invest in activities around  
7 that.

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25